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December 20, 2022

VIA ECF

Hon. Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *In re Madison Square Boys & Girls Club, Inc.*, No. 22 Civ. 7575 (KPF)
Consent Extension Request

Dear Judge Failla:

We filed the *Notice of Appeal* [Docket No. 1] on behalf of Appellant XClaim Inc. (“XClaim”) in the above-referenced matter (the “Appeal”). With the consent of the Office of the United States Trustee and Epiq Corporate Restructuring, LLC, XClaim respectfully requests that the Court extend the deadline for XClaim to file its appellant’s brief from December 29, 2022 to January 30, 2023.¹ This extension is sought both due to the upcoming holidays and in order to permit XClaim to substitute in and consult with new counsel who will be handling the Appeal and preparing any appellate briefing.

There have been no prior requests for such an extension. We appreciate Your Honor’s consideration of this request.

Respectfully submitted,

/s/ Amy C. Quartarolo

Amy C. Quartarolo (*pro hac vice* forthcoming, if required)

cc: All Counsel of Record (via ECF)

¹ The Debtor, Madison Square Boys & Girls Club, Inc., filed a *Notice of Non-Participation* in connection with the Appeal [Docket No. 6].

Application GRANTED. Appellant shall submit its opening brief on or before **January 30, 2023**. The remaining briefing schedule set forth in the Court's scheduling order (Dkt. #3) is likewise extended by 30 days, and any appellee brief shall be due on **March 1, 2023**, and any reply on **March 15, 2023**.

The Clerk of Court is directed to terminate the pending motion at docket entry 8.

Dated: December 21, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE